

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: William Steven Stanaitis Penny Mifflin Stanaitis Debtor(s) Citizens Bank, N.A. s/b/m to Citizens Bank of Pennsylvania Objectant(s) v. William Steven Stanaitis Penny Mifflin Stanaitis Respondent(s)	Chapter 13 Proceeding No. 23-12187 PMM
---	---

AMENDED OBJECTION TO CONFIRMATION OF THE PLAN

Citizens Bank, N.A. s/b/m to Citizens Bank of Pennsylvania, a secured creditor in this case objects to the Plan and to the confirmation of the debtor's Chapter 13 Plan and as grounds therefor would show the court the following:

1. The Plan does not provide for the secured creditor, Citizens Bank, N.A. s/b/m to Citizens Bank of Pennsylvania to receive the full value of its claim in violation of 11 USC §1325(a)(5)(B)(ii).
2. As of the date of the filing of the bankruptcy on July 24, 2023, Citizens Bank, N.A. s/b/m to Citizens Bank of Pennsylvania is the holder of a security interest in the debtors' property located at 349 Mulberry Drive, Limerick, PA 19468 (hereinafter "the property"). The amount of Citizens Bank, N.A. s/b/m to Citizens Bank of Pennsylvania's total claim is \$70,046.43 and the pre-petition arrears claim is \$31,348.16. A Second Amended Proof of Claim was filed by Citizens

Bank, N.A. s/b/m to Citizens Bank of Pennsylvania on or about March 18, 2024.

See Exhibit "A" attached hereto and made a part hereof.

3. Debtor's Plan proposes to pay CCO Mortgage Corp. \$18,000.00 in pre-petition arrears, an amount substantially smaller than Citizens Bank, N.A. s/b/m to Citizens Bank of Pennsylvania' arrears claim.
4. If the Plan is confirmed the Citizens Bank, N.A. s/b/m to Citizens Bank of Pennsylvania will suffer irreparable injury, loss and damage.

Respectfully submitted,

/s/ Mary F. Kennedy
Attorney I.D. No. 77149
1310 Industrial Blvd.
1st Floor, Suite 101
Southampton, PA 18966
215-942-9690 phone
215-942-9695 fax
Attorney for Citizens Bank, N.A.
s/b/m to Citizens Bank of
Pennsylvania